

# EXHIBIT 4

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**Leave to file granted on August 31, 2018**

**DECLARATION OF MADISON TRICE  
(ASSOCIATION OF BLACK HARVARD WOMEN)**

Madison Trice, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Madison Trice. I am a member of the Harvard College Class of 2021.
2. I am the Political Action Chair of the Association of Black Harvard Women (“ABHW”) and am submitting this Declaration individually and on behalf of ABHW in support of the continued utilization of race-conscious admissions practices at Harvard College.
3. ABHW was founded in 1975 when students from Radcliffe College met to develop an organization that would allow Black women to remain united after graduation. Since its inception, ABHW has focused on cultivating a place and community for Black Harvard women both on campus, and in the world at large.
4. ABHW seeks to bring Black women together for academic, cultural, political and social purposes. Members combine their intellect, spirit, and resources to address the needs and problems of Black women both at Harvard College and within the University as a whole. ABHW

also engages in discourse about national and international women's issues and causes. In addition to social and community events, ABHW provides opportunities for professional advancement, mentorship, political action, and community service. Each of these activities is centered around the goal of creating a space of belonging and sisterhood for Black women on campus.

5. While we feel privileged to be students at Harvard, there are many challenges to being a Black woman on this campus. It is our devotion to Black women and Black social causes that has compelled us to contribute our voices and experiences to this discussion. Having experienced the privilege of being a student within a diverse class at Harvard, we believe it is our responsibility to make sure these same opportunities are extended to our sisters, and all students, who will come after us.

6. Whereas Black women were historically some of the last individuals to be admitted to Harvard, ABHW is concerned that Black women would be some of the first to suffer if race-conscious admission practices were eliminated. Moreover, we are worried about the ramifications this decision would have not just at Harvard College, but on Black women applicants at universities nationwide.

7. ABHW supports Harvard's ability to consider race as one of many factors in admission because we have witnessed and personally reaped the benefits of a diverse educational environment. Our academic experiences at Harvard have been enriched by the opportunity to learn from our classmates who come from a variety of racial, socioeconomic, and geographic backgrounds. Their contributions during class and lectures provide us with a more robust understanding of our world.

8. Diverse student voices enrich classroom discussion and also add to the academic contributions that come out of Harvard. Each year our peers develop novel theses that are informed

by and borne out of their own background and experiences. For example, I knew a student from New York who wrote their thesis on urban life and litedance, a dance style that emerged in the Bronx. It is unlikely that other students, who were not exposed to this dance tradition in their neighborhood growing up, would have considered such a topic.

9. Diversity at Harvard does not merely influence academic spaces—it truly impacts all elements of campus life. From athletics to spirituality, the diversity of students enables each scene and component of Harvard life to be richer and more vibrant. ABHW members have been given a front row seat to the ways in which diversity can enrich the mission and work of a student organization. During our board meetings, we have seen how students from different backgrounds may recognize unique needs that are not being addressed on campus. Drawing from their unique vantage point, our members have proposed mentorship programs for individuals interested in STEM fields, or recommended specific speakers that could provide commentary on an under discussed area of student development. The diversity of our membership has not just resulted in novel ideas, but has created opportunities for students to collaborate on projects aimed at improving the Harvard community.

10. Despite the strides Harvard has made to address diversity, ABHW recognizes that there are still institutional shortcomings which can cause students to feel a sense of isolation. In many ways, Harvard can still feel like a space reserved for students who are white and wealthy. However, we have seen how the diversity of students can counteract this notion of exclusivity by providing students with a sense of community. Race-conscious admissions has allowed for a diverse class of students who are able to carve out spaces for students who previously have not felt a sense of belonging in the historically dominant culture of Harvard.

11. ABHW also recognizes that persistent racism and structural inequities in this country still preclude many individuals from accessing higher education. Race-conscious admissions play a part in addressing the inequality of opportunity that has historically excluded people of color from academic communities.

12. As a member of a diverse class at Harvard, I have experienced immense personal growth and development by and through this community. This growth is further highlighted when I contrast it with my previous educational experience at my private high school in Houston, Texas. My sense of belonging at my white, racially homogenous high school was precarious at best, and non-existent at worse. There were a number of times during my high school experience where I was subjected to implicit and explicit racism. During several of our football games, students arrived to the stands in black face. At times, academic opportunities were denied to me on account of my race. While my high school had a Black affinity group, which provided me some semblance of a community, it still remained difficult for me to fully talk about my experiences since we represented such a small percentage of the student body. These feelings of isolation were compounded by the fact that minority groups at my high school could not meet with each other and share in a sense of solidarity.

13. Once I arrived at Harvard, through ABHW and other communities, I was able to find a sense of belonging that I did not have during high school. While at times I still face racism and other forms of oppression, I have a robust community that helps me confront and address these challenges. In many ways, Harvard has been a space of healing for me. These communities, and the friendships I have developed within them, have provided me with space to discuss strategies for how to navigate the challenges of a particular institution, learn from the experiences of my peers, and celebrate my heritage and racial identity. This personal growth has also been enriched

by inter-community dialogue and collaboration. While cultural affinity groups at my high school mostly operated in isolation, the intergroup solidarity I have experienced and witnessed at Harvard has broadened my perspective. My experience at Harvard has been a welcome contrast to my high school experience, and I would hope the opportunity to experience such a vibrant community would be preserved for future students.

14. If Harvard were to eliminate race-conscious admissions, we believe that the University would lose out on students who could make meaningful contributions, academic or otherwise, to the campus. It is impossible to measure merit without taking into consideration an individual's whole experience. For many students, their race is a critical part of their development and identity.

15. A student body crafted solely based on applicants' grades and standardized test scores would be incomplete. There are many individuals at Harvard who are defined by much more than a perfect score on a standardized test. The richness of my class comes from students who are talented musicians, or those who are passionate about eradicating homelessness. The multitude of diverse talents and passions that students possess cannot be adequately captured by the narrow definition of merit advanced by Students for Fair Admissions in this case.

16. In addition to hurting Harvard as a whole, the elimination of race-conscious admissions would have cognizable harms for ABHW. When I arrived on campus for orientation, a Black undergraduate student began to cry as she told us she was grateful to see the next generation of Black women arrive on campus. It would be devastating to watch our board members graduate and not see those spaces replenished by incoming students who can carry out ABHW's legacy. The future of our organization and its place at Harvard is undoubtedly called into question by this case.

17. ABHW believes that Harvard's admissions policies are not without fault. It is important for Harvard to consider their assessment of students who come from a variety of disadvantaged backgrounds. For instance, there could be more attention and support provided to low-income students and first-generation college students. As an institution, Harvard must do better when developing policies and procedures to address the needs of all students.

18. Despite shortcomings, eliminating race-conscious admissions would not solve any of the inadequacies in Harvard's process. ABHW believes that any effort to eradicate race-conscious admissions would only serve to further burden marginalized students and hurt the Harvard community as a whole.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, August 29, 2018.

/s/ Madison Trice

Madison Trice